

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Gokada Inc.,

Debtor.

Chapter 11

Case No. 24-12377 (LSS)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE that Deplacer LLC (“Deplacer”) hereby appears by and through its undersigned counsel, Morrison Cohen LLP and Morris James LLP, pursuant to Section 1109(b) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 - 1532 (the “Bankruptcy Code”), and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). Deplacer, by and through its counsel, hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and the applicable Local Rules, that all notices given or required to be given in these cases and all papers served or required to be served in these cases, be given to and served upon the following:

MORRISON COHEN LLP

Heath D. Rosenblat, Esq.
909 Third Avenue, 27th Floor
New York, NY 10022-4784
Telephone: (212) 735-8600
Facsimile: (917) 522-3116
E-mail: hrosenblat@morrisoncohen.com

MORRIS JAMES LLP

Tara C. Pakrouh, Esq.
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: tpakrouh@morrisjames.com

PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any order, notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telex or otherwise filed or made with regard to the referenced case and proceedings

herein.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim or suit shall waive any rights to: (1) challenge the jurisdiction of the Court to adjudicate any matter, including, without limitation, any non-core matter; (2) have final orders in non-core matters entered only after *de novo* review by the District Court; (3) trial by jury in any proceeding so triable in these cases or any case, controversy or proceeding related to these cases; (4) have the District Court withdraw that reference in any matter subject to mandatory or discretionary withdrawal; or (5) any other rights, claims, actions, setoffs, or recoupments to which Deplacer, is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: October 22, 2024

MORRIS JAMES LLP

/s/ Tara C. Pakrouh

Tara C. Pakrouh (DE Bar No. 6192)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

E-mail: tpakrouh@morrisjames.com

-and

MORRISON COHEN LLP

Heath D. Rosenblat, Esq. (*pro hac vice* forthcoming)

909 Third Avenue, 27th Floor

New York, NY 10022-4784

Telephone: (212) 735-8600

Facsimile: (917) 522-3116

E-mail: hrosenblat@morrisoncohen.com

Counsel for Deplacer LLC

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2024, a true and exact copy of the foregoing *Notice of Appearance and Request for Service of Notices and Pleadings* was filed electronically with the Clerk of the Court using the CM/ECF system which in turn will send notification of such filing to all interested parties of record.

/s/ Tara C. Pakrouh
Tara C. Pakrouh (DE Bar No. 6192)